

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

LIEUTENANT SHARON ROBINSON,)	
DIRECTOR WINONA HANNAH,)	
SERGEANT MARCELLA SAWYER,)	
TELECOMMUNICATIONS)	
CARLA KIMBER, SERGEANT VERONICA)	
HARRIS and OFFICER LAWANDA)	
BURRAS,)	
)	
Plaintiffs,)	
)	
vs.)	Case No. 19-cv-00395
)	
CHICAGO STATE UNIVERSITY,)	Honorable Martha M. Pacold
CAPTAIN JAMES MADDOX, Individually)	
and in his official capacity, LIEUTENANT)	
CHARLES STEWARD, individually and in)	
his official capacity,)	
)	
Defendants.)	

**PLAINTIFF’S MOTION FOR EXTENSION OF TIME
TO FILE A MOTION FOR ALTERNATE SERVICE**

The Plaintiffs, LIEUTENANT SHARON ROBINSON, DIRECTOR WINONA HANNAH, SERGEANT MARCELLA SAWYER, TELECOMMUNICATIONS CARLA KIMBER, SERGEANT VERONICA HARRIS, and OFFICER LAWANDA BURRAS, by and through their attorneys, The Walters Law Firm, respectfully request an extension of time to serve Defendant Steward, pursuant to Fed. R. Civ. P. 4(m), and in support thereof, states as follows:

PROCEDURAL HISTORY

1. Plaintiffs filed their complaint on January 18, 2019, and the clerk issued summonses in the case on January 23, 2019.
2. Plaintiffs executed service on Defendants Chicago State University and Defendant Maddox on February 8, 2019, but were unable to serve Defendant Steward, as he is no longer employed there.
3. Plaintiffs filed their first Motion for Extension of Time to Serve Defendant Steward on April 18, 2019, explaining that Steward had moved to Florida. On April 23, 2019, this court granted the motion.
4. Plaintiffs filed their Second Motion for an Extension of Time to Serve Defendant Steward on _____, 2019, after finding out that Defendant Steward had been traveling back and forth between Illinois and Florida. On _____, 2019 this court granted the Motion and ordered September 11, 2019 as the deadline to serve Defendant Steward.

FACTUAL HISTORY

5. Plaintiffs have been diligent in their efforts to serve Steward and have expended significant resources to do so. However, despite this persistence, Plaintiffs have been unable to serve Defendant Steward.
6. Since the filing of the complaint, Plaintiffs have employed three separate services in Illinois and Florida to investigate the legal residence of Defendant, conduct a skip trace, and make several attempts to serve Defendant Steward at various addresses.
7. Plaintiff must now seek special order of court to serve Defendant Steward in an alternative manner. In order to properly do so, Plaintiff must also provide the court with affidavits from all three process servers, elaborating on the attempts at service.

8. Plaintiff has affidavits from two process servers. But, is still waiting on the affidavit from the third process server.
9. Plaintiff seeks an extension of time to file a Motion for Alternative Service in order to properly include all affidavits from their retained process servers. This request will not prejudice the Defendants, nor will it stall the progress of the case, as the Defendants have just sought an extension of time to file a Motion to Dismiss Plaintiff's Amended Complaint.

WHEREFORE, Plaintiffs respectfully request a fourteen day extension of time to file a Motion for Leave to Serve Defendant Steward by Alternative Method and any further relief that this Court deems appropriate.

DATED: September 11, 2019

Respectfully Submitted,

/s/ Kellie Walters
The Walters Law Firm
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Chicago, IL 60654
kwalters@walterslawoffice.net

CERTIFICATE OF SERVICE

The undersigned attorney swears and affirms that Plaintiff's Motion for an Extension to File a Motion to Serve by Alternate Means has been tendered to all interested parties on September 11, 2019 via the Northern District of Illinois' ECF system:

/s/ Kellie Walters